

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff

v.

ROWLAND MARCUS ANDRADE,

Defendant

CASE No. 3:20-cr-00249-RS-1

**MOTION FOR RECONSIDERATION  
OF ORDER DENYING  
DEFENDANT'S SECOND MOTION  
TO EXTEND SELF-SURRENDER  
DATE (ECF 814)**

Judge: Hon. Richard Seeborg

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**EXHIBIT – B**

**DECLARATION OF JOHN M. PIERCE**

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4 Attorneys for Defendant  
 5 ROWLAND MARCUS ANDRADE

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8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,  
 12 Plaintiff,  
 13 v.  
 14 ROWLAND MARCUS ANDRADE,  
 15 Defendant.

Case No. 3:20-CR-00249-RS

**DECLARATION OF JOHN PIERCE  
 ISO DEFENDANT'S MOTION FOR  
 RECONSIDERATION OF ORDER  
 DENYING DEFENDANT'S SECOND  
 MOTION TO EXTEND SELF-  
 SURRENDER DATE (ECF 814)**

Judge: Hon. Richard Seeborg

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18 DECLARATION OF JOHN M. PIERCE

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20 This declaration incorporates by reference all the facts set forth in the previous  
 21 declarations filed at docket numbers **788-1, 808-2, and 811-1**. I, John M. Pierce, hereby declare as  
 22 follows:

- 23
- 24 1. I am counsel of record for Defendant Rowland Marcus Andrade in the above-entitled  
 25 action and submit this declaration based on personal knowledge obtained through my  
 26 direct representation of Mr. Andrade, review of relevant case materials, and

communications with him and his medical providers. If called as a witness, I could and would testify competently thereto.

2. On December 29, 2025, I received an email from the Ninth Circuit CJA office indicating that they had approved the expert request. However, they noted that they need confirmation from the Chief Executive Office regarding the expert's hourly rate. Andrade's immediate assistance will be critical for the expert to complete their report, as Counsel does not have the information that the expert requires.
  3. Today, December 31, 2025, I received an email from Mr. Donson regarding phone accessibility within the Bureau of Prisons. Mr. Donson explained that communication with experts is significantly constrained in BOP facilities. Phone calls are generally limited to 15 minutes, after which the inmate must wait approximately one hour before making another call. There is no privacy, as conversations can be overheard by others in the unit, and access is further restricted by the fact that there are typically only four phones available for a unit of approximately 150 inmates.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on December 31, 2025.

/s/ John M. Pierce  
/s/ John M. Pierce